

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

T.E. "BUDDY" MONDAY)	
)	
Plaintiff)	
)	CIVIL ACTION
v.)	
)	FILE NO. 1:06-CV-1979-WSD
GROUP BENEFITS PLAN FOR)	
EMPLOYEES OF THE MARTIN-)	
BROWER COMPANY; THE MARTIN-)	
BROWER COMPANY EMPLOYEE)	
BENEFITS & RETIREMENT PLANS)	
COMMITTEE; HUB ONE LOGISTICS,)	
LTD.; THE MARTIN-BROWER)	
COMPANY; and THE STANDARD)	
INSURANCE COMPANY)	
)	
Defendants)	

MOTION TO EXTEND THE TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S COMPLAINT

Now comes defendant THE STANDARD INSURANCE COMPANY ("Standard"), and moves this Court, *nunc pro tunc*, to extend the time for filing the answer to plaintiff's complaint to October 17, 2006, showing the Court the following:

1.

This is an action under the Employee Retirement Income Security Act of 1974, as amended, 29 U.S.C. § 1001 *et seq.* ("ERISA").

2.

Standard's response to the complaint was due to be served on or before September 12, 2006.

3.

Standard requests *nunc pro tunc* that its deadline for responding to the complaint be extended through and including October 17, 2006.

4.

This motion is made in good faith, and no prejudice will result to either party should this Court grant the requested extension.

This 17th day of October, 2006.

/s/ Joelle C. Sharman

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Company

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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2006, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney(s) of record:

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This 17th day of October, 2006.

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